

# HINSHAW

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February 13, 2018

**VIA ECF**

Hon. Joseph F. Bianco, U.S.D.J.  
United States District Court  
Eastern District of New York  
100 Federal Plaza, Courtroom 1040  
Central Islip, New York 11722

**Re: *Pampena v. Encore Receivable Management, Inc. et al.***  
**Docket No.: 2:17-cv-03860-JFB-SIL**  
***Gil v. Encore Receivable Management, Inc. et al.***  
**Docket No.: 2:17-cv-06466-JFB-SIL**  
***Alesi v. Encore Receivable Management, Inc. et al.***  
**Docket No.: 2:17-cv-06473-JFB-SIL**

Dear Judge Bianco:

We represent Defendants Encore Receivable Management, Inc. (“Encore”) and Convergys Corp. (“Convergys”) (collectively referred to herein as “Defendants”), in the above referenced actions. We write pursuant to Your Honor’s instructions given during the pre-motion conference held in the *Pampena* case on February 9, 2018. We respectfully request that the motion briefing schedule set for Defendants’ motion to dismiss in *Pampena* be adopted in the recently merged *Gil* and *Alesi* cases above.

We thank the Court for its consideration of our request and its continued assistance in this matter.

Respectfully submitted,

HINSHAW & CULBERTSON LLP

s/ Nicholas A. Corsano

Nicholas A. Corsano

NAC:

CC: Mitchell L. Pashkin, Esq. via ECF